

**LTL ATTORNEYS LLP**

Enoch H. Liang (SBN 212324)  
601 Gateway Boulevard, Suite 1010  
South San Francisco, California 94080  
Tel: 650-422-2130  
Fax: 213-612-3773  
enoch.liang@ltmlattorneys.com

James M. Lee (SBN 192301)  
Caleb H. Liang (Bar No. 261920)  
300 S. Grand Ave., 14th Floor  
Los Angeles, California 90071  
Tel: 213-612-8900  
Fax: 213-612-3773  
james.lee@ltmlattorneys.com  
caleb.liang@ltmlattorneys.com

**HUNG G. TA, ESQ. PLLC**

Hung G. Ta  
JooYun Kim  
250 Park Avenue, 7th Floor  
New York, New York 10177  
Tel: 646-453-7288  
hta@hgtlaw.com  
jooyun@hgtlaw.com

*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF HUNG G. TA IN  
OPPOSITION TO DEFENDANTS'  
MOTIONS TO DISMISS**

Date: July 19, 2018  
Time: 1:30 p.m.  
Crtrm: 3  
Judge: Hon. Richard Seeborg

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), Co-Lead  
3 counsel to Lead Plaintiff Arman Anvari and the class in the above-captioned action. I am an active  
4 member in good standing of the bar of the State of New York and have been admitted *pro hac vice* in  
5 this matter. I submit this declaration in opposition to Defendants’ motions to dismiss.

6 2. Attached hereto as Exhibit A is a true and correct copy of the following article: Anna  
7 Irrera, Steve Stecklow, Brenna Hughes Neghaiwi, *Special Report: Backroom battle imperils \$230*  
8 *million cryptocurrency venture*, REUTERS (Oct. 18, 2017), available at  
9 [https://www.reuters.com/article/us-bitcoin-funding-tezos-specialreport/special-report-backroom-](https://www.reuters.com/article/us-bitcoin-funding-tezos-specialreport/special-report-backroom-battle-imperils-230-million-cryptocurrency-venture-idUSKBN1CN35K)  
10 [battle-imperils-230-million-cryptocurrency-venture-idUSKBN1CN35K](https://www.reuters.com/article/us-bitcoin-funding-tezos-specialreport/special-report-backroom-battle-imperils-230-million-cryptocurrency-venture-idUSKBN1CN35K). The article is cited in Lead  
11 Plaintiff’s Consolidated Complaint, ¶ 38, n. 15 (Dkt. No. 108).

12 3. Attached hereto as Exhibit B is a true and correct copy of Defendant Tezos Stiftung’s  
13 “September Update,” dated September 30, 2017, available at [https://www.tezos.ch/september-](https://www.tezos.ch/september-update.html#september-update)  
14 [update.html#september-update](https://www.tezos.ch/september-update.html#september-update).

15 4. Attached hereto as Exhibit C is a true and correct copy of Defendant Tezos Stiftung’s  
16 “Update on Contributions to Date,” dated July 5, 2017, available at [https://www.tezos.ch/update-on-](https://www.tezos.ch/update-on-contributions-to-date.html#update-on-contributions-to-date)  
17 [contributions-to-date.html#update-on-contributions-to-date](https://www.tezos.ch/update-on-contributions-to-date.html#update-on-contributions-to-date).

18 I declare under penalty of perjury that the foregoing is true and correct, this 8th day of June,  
19 2018.

21 /s/ Hung G. Ta  
22 Hung G. Ta